



For a thriving New England

CLF Massachusetts 62 Summer Street  
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April 6, 2023

*Submitted via FOIAonline*

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100 Boston, MA 02109-3912

**Re: Freedom of Information Act Request**

To Whom It May Concern:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 et seq., Conservation Law Foundation ("CLF") hereby requests all records pertaining to the environmental compliance of the facility listed on the Environmental Protection Agency Enforcement and Compliance History Online (ECHO) website as Twin Rivers Technologies Oleochemical Plant (Twin Rivers Technologies) at 780 Washington Street, Quincy, MA 02169 (FRS ID: 110000311190), including:

- I. Documents associated with the facility's Clean Water Act NPDES Permit (No. MA0004073):**
  - A. Compliance documents, including but not limited to notices of noncompliance, notices of equipment malfunction, notices of daily or monthly maximum exceedances, and any permittee record or report requested by the EPA, from June 14, 2021 to the date this request is filled;
  - B. Monitoring reports mandated by the monitoring requirements described in the facility's NPDES permit, including but not limited to all Discharge Monitoring Reports (DMRs) for outfalls 001 and 003 from May 1, 2021 to the date this request is filled;
  - C. Results from the facility's required ambient and mixing zone temperature monitoring study, submitted as part of the facility's monthly DMR submission (likely submitted in the August and March DMRs for 2010, 2011, 2012, 2013, 2014, and/or 2015 for outfall 003); and
  - D. The CWIS Biological Monitoring Report with the facility's entrainment monitoring results (likely submitted in 2011, 2012, 2013, 2014, and/or 2015).
- II. Enforcement documents associated with the facility:**

- A. Letters of warning, notices of violation, and administrative orders, from June 14, 2021 to the date this request is filled; and
- B. Consent agreements, court orders, administrative orders, or other orders governing the terms or status of the facility's compliance with its Clean Air Act and Clean Water Act permits, from June 14, 2021 to the date this request is filled.

**III. Any citizens complaints associated with Twin Rivers Technologies from June 14, 2021 to the date this request is filled.**

Please provide the requested records in electronic format if possible. To the extent you believe any requested record is exempt from disclosure, please provide a log identifying which documents you claim are exempt, specify the exemption or privilege that you assert is applicable, and explain why you believe such exemption or privilege is applicable.

CLF requests that any fees incurred in conjunction with this request be waived, as disclosure of the requested records is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester. 5 U.S.C. § 552(a)(4)(A)(iii); 40 C.F.R. § 2.107(l); Mass. Gen. Laws Ann. ch. 66, § 10(d)(v) (West). CLF is a 501(c)(3) organization and is seeking this information to inform CLF members and the public, including nearby residents, about the current state of environmental permitting and compliance at the facilities listed above.

Communications is an integral part of CLF's advocacy. We have a professional communications team that develops multi-media strategic communications plans for our initiatives and campaigns designed to deliver our message on multiple platforms to reach and engage diverse audiences. Communications tactics may include traditional media outreach, opinion pieces, blogs, features, and the creation and distribution of visual content to build a strong narrative, and raise public awareness. We also disseminate environmental news and analysis by our staff of experts to CLF members throughout New England via our website and email communications. In 2020 our website had 358,214 visits. In addition, as of February 2021, our email list is approximately 38,000 people, our Facebook audience is 20,943, on Twitter, CLF has 8,822 followers, on LinkedIn, we can reach 2,210 followers, and on Instagram, we have 1,366 followers. In 2020, CLF was quoted in the media 3,277 times in outlets including The Boston Globe, WBUR, Our Daily Planet, Chelsea Record, and many others.



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In the event that our request for a fee waiver is denied, we request that the total cost be minimized by providing the information in electronic format. Also, if fees are assessed, please provide in advance a written, itemized, good faith estimate of such fees. *Id.* at 32.07(2)(b).

We look forward to your written response within twenty business days from this request. Please do not hesitate to contact me at [ehsi@clf.org](mailto:ehsi@clf.org) if you have any questions. Thank you in advance for your time and attention to this matter.

Sincerely,

Ethan Hsi  
*Paralegal*  
Conservation Law Foundation